

Fill in this information to identify the case:

Debtor 1 Lawrence Angelo Walsh aka Lawrence A. Walsh aka Lawrence Angelo Walsh, Jr

Debtor 2 Carolyn Irene Walsh aka Carolyn I. Walsh
(Spouse, if filing)

United States Bankruptcy Court for the: Middle District of PENNSYLVANIA
(State)

Case number 20-02039

Form 4100R**Response to Notice of Final Cure payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: BANK OF AMERICA, N.A. Court claim no. (if known): 5-1

Last 4 digits of any number you use to identify the debtor's account: 0 8 9 3

Property Address: 406 4TH AVE
Number Street

SCRANTON PA 18505-1029
City State ZIP Code

Part 2: Prepetition Default Payments*Check one:*

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment*Check one:*

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 12/01/2024
MM/DD/YYYY

- ☐ Creditor states that the debtors(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ _____
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ _____
- c. **Total.** Add lines a and b. (c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

MM/DD/YYYY

Form 4100R – Cure Response Form Page 2

Debtor 1 Lawrence Angelo Walsh aka Lawrence A. Walsh aka Lawrence Angelo Walsh, Jr Case number (if known) 20-02039
First Name Middle Name Last Name

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

11/11/24

x /s/ Marisa Myers Cohen Date 11/11/24
Signature

Print Marisa Myers Cohen Title Attorney for creditor
First Name Middle Name Last Name

Company McCabe, Weisberg & Conway, LLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 1420 Walnut Street, Suite 1501
Number Street

Philadelphia, PA 19102
City State Zip Code

Contact phone (215) 790 - 1010

Email ecfmail@mwc-law.com

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Lawrence Angelo Walsh aka Lawrence A.
Walsh aka Lawrence Angelo Walsh, Jr. and
Carolyn Irene Walsh aka Carolyn I. Walsh
Debtor(s)

BANK OF AMERICA, N.A., or its Successor or
Assignee

Movant

vs.

Lawrence Angelo Walsh aka Lawrence A. Walsh
aka Lawrence Angelo Walsh, Jr. and Carolyn Irene
Walsh aka Carolyn I. Walsh

Jack N Zaharopoulos

Respondent(s)

Chapter 13

Bankruptcy No. 20-02039

**CERTIFICATION OF SERVICE OF RESPONSE TO NOTICE OF FINAL CURE
PAYMENT**

I, Marisa Myers Cohen, attorney for BANK OF AMERICA, N.A., hereby certify that
I served a true and correct copy of the foregoing Response to Notice of Final Cure Payment,
by United States Mail, first class, postage prepaid, and/or electronic means, upon the
following: Date Served: 11/11/24

Carolyn Irene Walsh aka
Carolyn I. Walsh
406 4th Avenue
Scranton, PA 18505

Lawrence Angelo Walsh aka
Lawrence A. Walsh aka
Lawrence Angelo Walsh, Jr.
406 4th Avenue
Scranton, PA 18505

Lisa M. Doran
Doran & Doran, P.C.
69 Public Square, Suite 700
Wilkes-Barre, PA 18701
Attorney for Debtors

Asst. U.S. Trustee
United States Trustee
US Courthouse
1501 N. 6th St
Harrisburg, PA 17102

Jack N Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, Pennsylvania
17036
Trustee

/s/ Marisa Myers Cohen

MARISA MYERS COHEN, ESQUIRE ID #87830

ANDREW M. LUBIN, ESQUIRE ID # 54297

Attorney for BANK OF AMERICA, N.A.

1420 Walnut Street, Suite 1501

Philadelphia, PA 19102

Telephone: (215) 790-1010

Facsimile: (215) 790-1274

Email: ecfmail@mwc-law.com